

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA

PAUL V. AMBROSE,	:	
Plaintiff,	:	CASE NUMBER: No. 07-1248
	:	
vs.	:	Judge Arthur J. Schwab
TRAIN COLLECTORS ASSOCIATION,	:	
and	:	
EASTERN DIVISION - T.C.A.	:	
Defendants.	:	

PLAINTIFF'S MOTION TO EXCEED PAGE LIMIT ON HIS BRIEF IN
OPPOSITION TO DEFENDANTS' MOTION TO DISMISS

Plaintiff Paul V. Ambrose, by and through his undersigned counsel, requests this Honorable Court to allow him to exceed the page limits on his Brief in Opposition to Defendants' Motion to Dismiss the Amended Complaint, and respectfully avers the following.

1. Defendants filed their Motion to Dismiss the Amended Complaint (D.E. #21) on November 29, 2007. In support of their Motion, Defendants filed their Brief (D.E. #22) on said date.

2. This Court earlier on November 28, 2007 had granted Defendants' leave to exceed the Page Limit on their Brief and increased the page number to up to twenty-five pages.

3. Defendants' Brief in support of their Motion to Dismiss the Amended Complaint totaled twenty-two pages. Defendants' Brief incorporated by reference, but did not duplicate, the arguments and case law cites included in their earlier Brief in Support of

their Motion to Dismiss the Complaint (D.E. #13), which totaled ten pages. Accordingly, Plaintiff is required to respond to a total of **thirty-two** pages of arguments that seek to dismiss all nine counts of the Amended Complaint in a case where the Publisher has already publicly admitted infringing Plaintiff's copyrights and proceeded to properly apologize to Plaintiff.

4. Plaintiff would respectfully request that this Court allow him up to thirty pages to respond to the arguments contained in Defendants' two Briefs.

5. Pursuant to Local Rules, a copy of the propose Order is attached.

December 12, 2007

Respectfully submitted,

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